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14 **ATTORNEYS FOR PLAINTIFFS**

15  
16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA, SOUTHERN DIVISION  
18

19 J.L., a minor by and through his  
Guardian Ad Litem MINA LILLY, T.A.,  
20 a minor by and through her Guardian  
Ad Litem SHWANA HARDY; and S.T., a  
21 minor by and through his Guardian Ad  
Litem JOANNE TAITANO,

22 Plaintiffs,

23 v.  
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25 CLARK COUNTY SCHOOL DISTRICT,  
MELISSA OLSZEWSKI, SHAWN  
26 HALLAND and DOES 1-50,

27 Defendants.  
28

Case No. 2:23-cv-00810-JCM-BNW

**STIPULATION AND [PROPOSED]  
ORDER TO MODIFY SCHEDULING  
ORDER**

**[SECOND REQUEST]**

**District Judge James C. Mahan  
Magistrate Judge Brenda Weksler**

Date Filed: May 24, 2023  
Trial Date: Unassigned

The Parties, through their undersigned counsel, hereby stipulate as follows:

**1. STATEMENT OF DISCOVERY COMPLETED**

The Parties submitted their stipulated discovery plan and scheduling order on September 14, 2023 (Dkt. No. 25) and the Court entered its scheduling order on September 15, 2023 (Dkt. No. 26). On December 29, 2023, the Court granted the Parties' First Request to modify the scheduling order (Dkt. No. 33). The Parties have completed the following discovery to date:

1. On September 28, 2023, Defendants Clark County School District ("CCSD") and Shawn Halland (collectively the "CCSD Defendants") served their initial disclosures.

2. On September 28, 2023, Plaintiffs served their initial disclosures.

3. On November 7, 2023, CCSD and Halland served their first supplemental disclosures.

4. On November 22, 2023 CCSD served Interrogatories and Requests for Production, Set One upon Plaintiffs J.L., T.A. and S.T.

5. On December 1, 2023, Plaintiffs served Interrogatories and Requests for Production, Set One to Defendants CCSD and Halland.

6. On December 1, 2023, Plaintiffs noticed the depositions of Defendants CCSD, Halland and Olszewski, as well as non-parties Daniel Ciarciaglini, Shirley Diaz, Elaine Hansen, Natalie Holshue, James Kettner, Rebecca Lucero and Jodie Swader.

7. On December 15, 2023, the CCSD Defendants requested dates for depositions of Plaintiffs' guardians.

8. On December 22, 2023, Plaintiffs served their responses to CCSD's Interrogatories and Requests for Production, Set One.

9. On January 16, 2024, CCSD served its responses to Plaintiffs' Interrogatories and Requests for Production, Set One.

10. On January 19, 2024, CCSD and Halland served their second

supplemental disclosures.

## 2. STATEMENT OF DISCOVERY THAT REMAINS TO BE COMPLETED

The following discovery remains to be completed:

1. Completion of all currently noticed depositions;
2. Additional depositions and written discovery, if needed based on information or evidence gathered through the outstanding discovery and pending depositions;
3. Disclosure of Experts, Expert Reports; and
4. Expert Discovery and Depositions.

## 3. REASONS WHY DISCOVERY WILL NOT BE COMPLETED BY THE CURRENT DISCOVERY CUTOFF

Under the current deadlines, lay discovery closes on April 5, 2024. The Parties need additional time to meet-and-confer regarding production of documents, to review them when produced, and to take party depositions thereafter. The parties are also engaged in ongoing settlement discussions and are hopeful that a resolution can be reached. Accordingly, the Parties request a 90-day extension of all deadlines.

## 4. PROPOSED SCHEDULE

The Parties hereby stipulate and agree that the deadlines to complete discovery as set forth in the Scheduling Order (Dkt. No. 33) shall be extended ninety (90) days as follows:

1. **Lay Discovery Period:** The deadline to complete lay discovery shall be extended from April 5, 2024 to **July 8, 2024**.
2. **Initial Expert Disclosure:** The deadline to file initial expert reports shall be extended from May 6, 2024 to **August 5, 2024**.
3. **Rebuttal Expert Disclosure:** The deadline to file rebuttal expert reports shall be extended from June 5, 2024 to **September 3, 2024**.
4. **Expert Discovery Period:** The deadline to complete expert discovery shall be extended from July 8, 2024 to **October 7, 2024**.

1           **5.     Dispositive Motions:** The deadline to file dispositive motions shall be  
2 extended from August 7, 2024 to **November 5, 2024**.

3           **6.     Pretrial Order:** If no dispositive motions are filed, the Joint Pretrial  
4 Order shall be filed thirty (30) days after the date set for the filing of dispositive  
5 motions. Therefore, the joint pretrial order shall be extended from September 6, 2024  
6 to **December 5, 2024**. In the event dispositive motions are filed, the date for filing  
7 the Joint Pretrial Order shall be suspended until thirty (30) days after the decision on  
8 the dispositive motions or by further order of the court.

9           This stipulation and order is sought in good faith and not for the purpose of  
10 delay. This is the *second* request for a scheduling extension.

11           **IT IS SO STIPULATED.**

12  
13 Dated: March 15, 2024

WALKUP, MELODIA, KELLY & SCHOENBERGER

14  
15 By: 

16 KHALDOUN A. BAGHDADI  
17 VALERIE N. ROSE  
18 KATHERINE CONNOLLY  
Attorneys for Plaintiffs  
Admitted Pro Hac Vice

19  
20 Dated: March 15, 2024

GREENBERG TRAURIG, LLP

21  
22 By:           /s/ Kara Hendricks          

23 KARA B. HENDRICKS  
24 WHITNEY L. WELCH-KIRMSE  
25 Attorneys for Defendants  
26 CLARK COUNTY SCHOOL DISTRICT and  
27 SHAWN HALLAND  
28

1 Dated: March 15, 2024

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By           /s/ Melissa Olszewski          

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MELISSA OLSZEWSKI

*Pro Se*

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**ORDER**

In consideration of the stipulation by the Parties, and with good cause appearing,

1. **Lay Discovery Period:** The deadline to complete lay discovery shall be extended from April 5, 2024 to **July 8, 2024**.

2. **Initial Expert Disclosure:** The deadline to file initial expert reports shall be extended from May 6, 2024 to **August 5, 2024**.

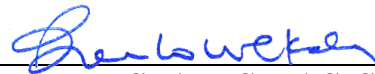
3. **Rebuttal Expert Disclosure:** The deadline to file rebuttal expert reports shall be extended from June 5, 2024 to **September 3, 2024**.

4. **Expert Discovery Period:** The deadline to complete expert discovery shall be extended from July 8, 2024 to **October 7, 2024**.

5. **Dispositive Motions:** The deadline to file dispositive motions shall be extended from August 7, 2024 to **November 5, 2024**.

6. **Pretrial Order:** If no dispositive motions are filed, the Joint Pretrial Order shall be filed thirty (30) days after the date set for the filing of dispositive motions. Therefore, the joint pretrial order shall be extended from September 6, 2024 to **December 5, 2024**. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the decision on the dispositive motions or by further order of the court.

**IT IS SO ORDERED.**



UNITED STATES MAGISTRATE JUDGE

DATED this 18 day of March,  
2024.